

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

STATE OF ALABAMA, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, *et al.*,

Defendants.

Case No. 2:18-cv-00772-RDP

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants United States Department of Commerce, Wilbur L. Ross, Bureau of the Census, and Ron S. Jarmin (“Defendants”), through their undersigned counsel, hereby move for an extension of time to respond to the Complaint in this case. As set forth below, counsel for Defendants has conferred with counsel for Plaintiff State of Alabama, who has represented that neither Plaintiff State of Alabama nor Plaintiff Morris J. Brooks, Jr. oppose the motion. In support of their motion, Defendants state as follows:

1. Defendants’ response to the Complaint (Dkt. No. 1) is currently due on July 30, 2018.
2. Defendants request a 45-day extension of time, to and including September 13, 2018, to file a response to the Complaint.
3. This lawsuit raises complex legal issues that will require coordination between and amongst the Defendants and the Department of Justice. Accordingly, a modest, 45-day extension of time to respond to the Complaint would be appropriate in this case.

4. Undersigned counsel for Defendants has conferred with counsel for Plaintiff State of Alabama regarding this motion. Plaintiff State of Alabama does not oppose Defendant's motion. Moreover, counsel for the State of Alabama conferred with Plaintiff Morris J. Brooks, Jr. regarding Defendant's motion and, following that conference, informed undersigned counsel that Plaintiff Brooks also does not oppose the motion.

5. Granting the motion will not prejudice any parties or affect any other deadlines in this case.

6. A proposed order is attached hereto.

Dated: July 19, 2018

Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

BRETT M. SHUMATE
Deputy Assistant Attorney General

JOHN R. GRIFFITHS
Director, Federal Programs Branch

CARLOTTA P. WELLS
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/s/ Brad P. Rosenberg
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

For Plaintiff:

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For Proposed Intervenor-Defendants:

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I also hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participant:

Morris J. Brooks, Jr.
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/s/ Brad P. Rosenberg
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